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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 WONGAB CORPORATION,
13
14 Plaintiff,

15
16 v.

17
18 TARGET CORPORATION; et al.,
19
20 Defendants.

Case No. 2:18-cv-02625-JAK-AS
Hon. John A. Kronstadt Presiding

**JOINT CLAIM CONSTRUCTION
AND PREHEARING STATEMENT**

By and through their attorneys of record, who are set forth below, the parties – Plaintiff Corporation (“Wongab”) and Defendant Target Corporation (“Target” collectively with Wongab, the “Parties”) – hereby submit this jointly signed Claim Construction and Prehearing Statement.

(a) The Parties’ agreed constructions

Claim(s)	Term or Phrase	Construed Meaning	Specification Support
1, 2, 3, 4, 5, 6, 7, 8	“Warp knitting fabrics”	Cloth material created by interlacing a plurality of yarns arranged in parallel with one another into loops and sequentially connecting the loops in a lengthwise direction of the material.	1:25-28
1, 5, 6, 7	“ground organization”	The underlying material.	
1	“warps”	Longitudinal running yarns (threads) in a fabric.	1:25-28
1	“knitted”	Interlacing of at least two yarns into a pattern or stitch.	
1, 4	“loop shape”	The form of the space defined by the yarns once interlaced.	2:29-52; 4:62-5:4; 5:58-63; 7:3-21; Fig. 21
1	“pattern organization”	A design or shape of yarns other than the “ground organization.”	1:45-48, 3:8-12, 7:10-29, Fig. 21.
1	“knitted on the ground organization”	Interlacing of the pattern organization yarns with the ground organization yarns.	7:22-29
1, 5, 6, 7	“unit designs”	Design constituting one cycle of unit organizations in the knitting direction (longitudinal direction).	4:10-12
1	“continuously arranged”	In an uninterrupted sequence.	
1, 5, 6, 7	“transverse direction”	In the non-knitting direction (side to side).	4:10-12
1, 2, 3, 5, 6, 8	“unit organizations”	A ground organization having a network	4:6-9

1			structure of a certain shape, formed by a plurality of unit chains assembled so that chain number groups are consecutively repeated.	
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3				
4	1, 2, 8	“longitudinal direction”	In the knitting direction (up and down).	4:10-12
5	1	“specific loop shape”	A particular geometric shape of knitted yarns.	5:1-4
6				
7	1, 4	“network structure”	The configuration of unit organizations with one another.	3:3-7
8				
9	1, 3	“chain of a specific chain number group”	A group composed of a plurality of numbers obtained by consecutively arranging chain numbers of unit chains.	4:3-6
10				
11				
12	1, 3	“array of plurality of chain numbers”	A set of numbers associated with sections of a chain that indicate the movement of needles for that section of chain	5:5-20
13				
14				
15	1	“each of the unit organizations”	Every one of the unit organizations.	
16	1	“has a different loop shape”	Has a different geometric shape of knitted yarns.	
17				
18	1	“from each other”	Other unit organizations apart from the one referred to.	
19				
20	2	“consecutively knitting”	An uninterrupted knitting sequence.	
21	2	“a plurality of loops”	At least two loops.	
22	2	“having the same shape”	Having the same geometric shape.	
23				
24	3	“two ground guidebars”	Two different bars used to control the yarn knitted into ground organization.	4:14-42
25				
26	3	“linked with the chain”	Coupled with a single chain.	5:5-20
27	3	“of the specific chain number group”	A group composed of a plurality of numbers obtained by consecutively arranging	4:3-6
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		chain numbers of unit chains.	
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(b) The Parties' disputed constructions

The following claim terms appear solely in dependant Claims 5-8. Defendant contends and suggested to Plaintiff that it is not necessary to construe these claim terms because (i) if the accused product does not infringe Claim 1, it cannot infringe the dependent claims and (ii) if Claim 1 is invalidated by the prior art, Claims 5-8, will be as well.

Plaintiff declined to accept this proposal.

In addition, Defendant contends that the terms listed below cannot be properly construed pursuant to 35 U.S.C. 112 and therefore does not provide a proposed construction of such terms.

Claim(s)	Term or Phrase	Plaintiff's Construed Meaning	Specification Support
5, 6, 7	"at least two-row unit designs"	There are at least two rows of unit designs.	2:57-64; 4:6-9; 4:55-67; 5:17-57; 6:39-7:2
5	"the unit organizations of any one unit design"	The unit organization of any particular unit design.	6:41-43; Fig. 13
5	"arrayed in zigzag with the unit organizations of another unit design"	Offset from the unit designs adjacent to it.	6:41-43; Fig. 13
6	"with the unit organizations"	With particular unit organizations.	
7	"the width of any one unit design"	Width of a unit design.	4:10-12
7	"is wider than that of another unit design"	Longer than another unit design's width.	4:10-12
7	"adjacent to the one unit design"	Immediately above, below, or next to the unit design.	
8	"the length of one unit organization"	Length of a unit organization.	4:6-9
8	"longer than that of another unit organization"	Longer than another unit organization's length.	4:6-9
8	"adjacent to the one unit organization"	Immediately above, below, or next to the unit organization.	

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2 **(c) Terms whose construction are most significant**

- 3 1. Warp knitting fabrics
4 2. Ground organization
5 3. Pattern organization
6 4. Knitted on the ground organization
7 5. Unit designs
8 6. Unit organizations
9 7. Network structure
10 8. Chain of a specific chain number group
11 9. Array of plurality of chain numbers

12 **(d) Time for presentation**

13 Neither of the Parties will require more than 45 minutes for their presentation
14 at the claim construction hearing.

15 **(e) Witnesses**

16 Neither of the Parties proposes to call witnesses at the claim construction
17 hearing.

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19 Dated: October 11, 2018

By: /s/ Scott A. Burroughs
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DONIGER /BURROUGHS
Attorneys for Plaintiff

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23 Dated: October 11, 2018

By: /s/ Willmore F. Holbrow III
Willmore F. Holbrow III, Esq.
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TARGET CORPORATION

1 Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories
2 listed, and on whose behalf this filing is submitted, concur in the filing's content and
3 have authorized the filing.
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